

REMARKS

In response to the Office Action dated June 30, 2004, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims.

The allowance of claims 9-16 is acknowledged, with appreciation. In the statement of reasons for allowance, the Office Action states that claim 9 is allowable because the prior art does not show a three-element-lens taking system wherein, among other features, "the third lens element is a plastic meniscus element with a specific orientation to the image side." Applicant would like to point out that claim 9 is not limited to an arrangement in which the third lens element is a plastic meniscus element. Rather, the claim recites that the third lens element is a plastic meniscus lens element "or a plastic biconcave lens element". Hence, the statement of reasons for allowance should not be construed to limit claim 9 to a third lens element which is only a plastic meniscus element.

The Office Action indicates that claims 2-5 contain allowable subject matter. In response thereto, the subject matter of claim 2 has been incorporated into claim 1, and each of claims 3-5 has been rewritten in independent form. Accordingly, it is respectfully submitted that claims 1, 3-5, 7 and 8, as well as new claims 17-22, are in condition for allowance.

Rejected claim 6 has been rewritten in independent form. As described in paragraph [0025] of the specification, the conditional formula recited in claim 6 relates to the correction of chromatic aberrations. Specifically, in a three-element taking lens system, in which the three elements respectively have positive-positive-negative optical powers, fulfillment of the conditional formula helps to prevent aggregation of chromatic aberration that can result from the use of two plastic lens elements, and thereby provides good optical performance.

Claim 6 was rejected as being unpatentable over the *Meyers* patent (U.S. 5,715,096), with specific reference to Table 1A, appearing in column 7 of the patent. The patent

discloses a taking lens system that comprises, from the object side, a first lens unit having a positive optical power, and aperture stop, a second lens unit having a positive optical power, and a third lens unit having a negative optical power. The first lens unit is comprised of a composite lens structure, i.e. a doublet, having a positive lens element E_1 and a negative lens element E_2 cemented together. The second lens unit also comprises two lens elements, namely a negative lens element E_3 and a positive lens element E_4 . The third lens unit is comprised of a single, negative lens element E_5 . Thus, the taking lens system of the *Meyers* patent consists of a total of five lens elements, rather than being a three-element system as recited in the claims.

In Example 1 of the patent, to which Table 1A relates, all of the lens elements are made of glass. Only Example 2, depicted in Table 2A, contains a lens element made of plastic, namely lens element E_3 . For at least these reasons, therefore, the *Meyers* patent discloses an arrangement that is significantly different from the three-lens-element taking lens system that was recited in original claim 1.

In a three-element taking lens system in which two of three elements are made of plastic, as recited in claim 1, the potential for chromatic aberration is significant. As noted above, the conditional formula recited in claim 6 is directed to the correction of this chromatic aberration. In contrast to the claimed arrangement, the *Meyers* patent discloses that each of the first and second lens units is comprised of a combination of a positive and a negative lens element. It appears that the purpose of this arrangement is to correct chromatic aberration. Since, at most, only one of the five lens elements is made of plastic, the proportion of chromatic aberration resulting from the use of this material will be significantly less than that which arises in the arrangement recited in the claim. Because of these different arrangements, the *Meyers* patent does not lead a person of ordinary skill in the art to employ a

glass lens element having an Abbe number greater than 58 for the purpose of reducing chromatic aberrations. In other words, since the *Meyers* patent does not disclose the particular three-lens-element taking lens system recited in the claims, it cannot be deemed to suggest the application of the specific condition recited in claim 6 to such a taking lens system.

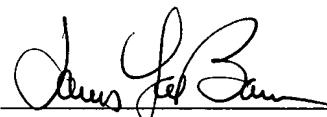
Accordingly, it is respectfully submitted that the subject matter of claim 6 is not suggested by the teachings of the *Meyers* patent.

Reconsideration and withdrawal of the rejections, and allowance of all pending claims, is respectfully requested.

Respectfully submitted,

BURNS, DOANE, SWECKER & MATHIS, L.L.P.

Date: September 28, 2004

By: 
James A. LaBarre
Registration No. 28,632

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620